

April 12, 2010

OPEN LETTER TO THE COUNCIL OF MISSISSIPPI MILLS ON THE SUBJECT OF SEPTAGE TREATMENT

■ Question 1

How did septage treatment become part of the sewage project application for funding from the Ontario government and the Federal government?

Answer 1

Apparently council was told that the chances of the Environment Ministry approving the application would be substantially increased if septage treatment was added to the application. So it was added without ANY comparative study of other more economic options. Subsequently, the Province and the Federal government approved the project for funding.

■ Question 2

Why is such a sophisticated system being used for treating septage when septage does not have to be treated at all before spreading on the land?

Answer 2

See question #1 for part of the answer and see question #3 for another part. Meanwhile, if you want to know the costs of treating septage by different methods, the costs arrived at by the Renfrew County study of 2005 found the lowest cost method to be in-truck lime stabilization, which costs \$50 to treat one septic tank of septage. The cost of treatment at a plant using the processes of the proposed Almonte wastewater treatment plant was estimated at \$250 to treat one tank. The cost difference is because one method treats the septage in a tank truck and the other treats it in a capital facility that can cost \$27 million.

■ Question 3

What part of that \$27 million will be charged to rural residents?

Answer 3

At the moment, it is estimated that rural share of the \$27 million will be \$1.9 million to reflect the portion of the facility that will be devoted to septage. An Ontario/Federal grant will cover all but \$644,000 of the \$1.9 million. The municipal administration estimates that \$172,000 will be recovered from development charges leaving \$422,000 to be paid by rural residents but that is actually only the nose of the camel. What was not mentioned in the public presentation of February 18 but has been stated by the mayor is that rural residents will be required to pay all the operating costs of the septage processing portion of the system even if they do not use it and these operating costs will be levied on rural residents as a special tax to recover any operating shortfall due to a lack of tipping fee revenue from actual users.

■ Question 4

What is the town's plan to deal with the excess capacity of the septage element of the processing system?

Answer 4

The town proposes to offer septage treatment to surrounding municipalities at a profit to offset some of the operational costs. This raises the question of how realistic the possibility is of selling any of this capacity to surrounding municipalities. Since it continues to be legal to spread septage on farm lands, will these surrounding rural residents pay substantial haulage and tipping fees or will they just call their local honey wagon operator and pay the usual pumping fee and let the wagon operator dispose of it legally as he sees fit? The cost difference is substantial. In the absence of any offset of costs rural residents will pay for the shortfall.

■ **Question 5**

Why did the town recommend such excess capacity when they knew it would exist for much of the next 20 years?

Answer 5

The town's business plan states: "Septage treatment capacity at the waste water treatment plant will decline over the forecast period as municipal waste water treatment demands increase with growth. As [a] result the available treatment capacity to accommodate septage from outside of the town will decline over the period to 2031."

In short, the extra capacity to accommodate septage will eventually be used by urban residents as wastewater demand increases, even though that extra capacity was paid for by rural residents.

■ **Question 6**

Other than being unfair to rural residents, is there a basic flaw in the town's reasoning?

Answer 6

Yes. When Renfrew County undertook an examination of biosolids and septage management in 2005, they came to a number of conclusions. The following are direct quotes from their conclusions:

1. "The lowest cost and simplest method of septage treatment is lime-stabilization. This method can be implemented in the timeliest manner, and with proper checks and safeguards is an environmentally acceptable and appropriate method of treatment. This method of treatment can be applied across the County by the private sector and facilitated by the Municipalities."

2. "With the current climate of uncertainty, septic haulers are very reluctant to take on more risk and would prefer that the municipalities provide septage treatment. Municipalities similarly are very reluctant to initiate the time consuming and expensive process of plant upgrades, or to take responsibility for what has been a private sector solution, until they know what the ground rules are. This climate of uncertainty has placed a stress on all participants, to the point where the most convenient solution, but not necessarily the best solution may be pursued. A rush to find quick solutions may ultimately hurt the homeowners and taxpayers who will have to pay the bill."

■ **Question 7**

So what is the cause of the uncertainty mentioned in the Renfrew conclusions?

Answer 7

One of the election planks of the McGuinty government was to ban the practice of spreading septage on farmlands. They have had 6 years to act on this promise and have done nothing. It is logical that if they intend to do something, they should lay out a staged ban indicating when the various stages will be implemented and what the accepted methods of treatment will be under the legislation. Not only have they not done that, but in a November letter to the Mayor of Mississippi Mills, the Ontario Minister of the Environment states:

"The development of septage treatment facilities is progressing as a result of the government's investments in infrastructure, studies of alternative treatment options and development of environmentally protective standards. As septage treatment capacity increases in Ontario, other implementation measures, such as your suggestion of a phased-in ban, will be reviewed."

It is apparent that the Ontario government has no plan other than hoping that municipalities will act on the question. Mississippi Mills management has stated in the past that the Ontario government is committed to a ban on septage spreading. One can see the level of commitment by the fuzzy statement of Minister Gerretsen. It implies no commitment to a decision on a ban, staged or not.

Conclusion

The current septage business plan puts a substantial capital cost on rural residents at the same time as it exposes them to unknown but substantial operating costs over the next 20 years. At the same time it obligates rural residents to have all septage delivered to the facility and pay as yet unknown fees. It is unfair inasmuch as it visits costs, restrictions and risks on rural residents in order to create a plant of sufficient size to accommodate the urban requirement for the future. At the same time it requires rural residents to pay for a share of the facility that will not be available to them after 2031 according to the forecast increase in urban use.

Recommendations

1. That the municipality not proceed with the septage portion of the project until written confirmation of the Province's intention to ban the field spreading of septage (including a specific time-frame) is received. The Province could hardly complain of such a change in plans because the economics of the septage portion is dependent on the Province introducing and passing enabling legislation.
2. That the municipality remove septage treatment from the plant entirely since the proposed facility is designed primarily for wastewater treatment. A plant for treating septage would be designed quite differently because the fluids to solids ratio in septage is a tiny fraction of what it is for wastewater. A plant solely designed for septage would reflect this.

It is preferable to leave the septage treatment question open until the Province legislates a change to current practices. It is not only possible but also probable that the requirements will include lime treatment, a process that is one-fifth the cost of treating septage in a wastewater plant, according to the Renfrew septage economic study of 2005.

3. That if the municipality accepts neither #1 or #2, it make clear all of the costs, fees, and taxes that will be imposed on rural residents in the 20 years that the facility is available to treat septage, both at capacity and at levels if usage is low or minimal. The only cost clearly revealed to date is the capital cost.

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